

IN THE DISTRICT COURT OF THE UNITED STATES

DISTRICT OF SOUTH CAROLINA

FLORENCE DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 4:22CR00061-SAL
)	
vs.)	
)	SENTENCING MEMORANDUM
JOSEPH ALAN WRIGHT)	
_____)	

On January 25, 2022, the government filed an indictment against Mr. Wright which charged him with both kidnapping and carjacking the Senior Pastor of Immanuel Baptist Church in Florence, South Carolina, on December 21, 2021. By any measure, Mr. Wright has committed extremely serious offenses. Mr. Wright deserves, and will receive, a substantial sentence for what he has done. Mr. Wright's advisory sentencing guideline range is from 210 to 262 months of imprisonment. This range covers a period of time from roughly 17.5 years up to 22 years in prison. In making its sentencing determination, Mr. Wright would like for this Honorable Court to consider his history and characteristics as they relate to these offenses. Mr. Wright further believes that his mitigating history and characteristics justify a sentence either below his current advisory guideline range or a sentence at the low end of this range.

MR. WRIGHT'S HISTORY AND CHARACTERISTICS

Joseph Alan Wright was born on July 6, 1982, to an alcohol and drug-abusing woman named Patricia Graf. Mr. Wright has never had any relationship with his birth father, Mike Johnson, and Ms. Graf never really functioned as a mother to Mr. Wright. Ms. Graf abused substances during her pregnancy, continued to abuse drugs and alcohol, and eventually lost

custody of her son. Mr. Wright's grandmother, Teresa Horne, raised him, and Mr. Wright refers to her as his mother. (PSR at ¶¶ 81, 82).

Mr. Wright was sexually abused as a child for many years by adult men in his neighborhood. Paragraph 83 of the PSR mentions that Mr. Wright told North Carolina prison officials that he was a member of a satanic church. Although Mr. Wright has said this, this statement is not correct. Mr. Wright has experienced a ritualistic type of abuse which he has characterized as "satanic" or "demonic" at different times in the past. Suffice it to say that Mr. Wright has experienced childhood trauma that no one should have to endure.

Mr. Wright's school records show his initial placement in the behavioral/emotionally handicapped program was as early as 1990. Mr. Wright would have been in approximately the second (2nd) grade then. Mr. Wright continued in the behavioral/emotionally handicapped program until at least the 1998-1999 school year. This would have been around Mr. Wright's tenth-grade (10th) year which was his last in the county school system. It does appear that Mr. Wright's behavior resulted in this placement which is consistent with Mr. Wright's attention deficit/hyperactivity disorder (ADHD) diagnosis in 1987. (PSR ¶ 93).

It also appears that Mr. Wright's exposure to the criminal justice system began in 1998. Mr. Wright was 16 at that time. Over the years, Mr. Wright has been to prison several times for sentences of generally less than two-years at a time with a two-year sentence being the most he has ever received at one time.

Mr. Wright has also used drugs as detailed in the PSR in paragraphs 97 through 99. Mr. Wright did not disclose the true extent of his hallucinogenic drug use. Mr. Wright has taken extensive amounts of LSD during the times that he has used it. He drank from a vial of LSD which

was the equivalent of many single doses. Based on this drug use, Mr. Wright continues to have dreams and flashbacks related to that experience with the powerful and mind-altering drug.

As detailed in paragraphs 93 through 96 of the PSR, Mr. Wright has been diagnosed with and treated for several mental health issues over the years. These mental health issues include the previously mentioned ADHD diagnosis as well as Bipolar-Disorder, Post Traumatic Stress Disorder (PTSD), severe anxiety, and antisocial and borderline personality disorder. Mr. Wright has taken medication for these mental health problems over the years. These medications and the current medications he takes in the Florence County Detention Center are all listed in the PSR.

BACKGROUND OF THE OFFENSE

Mr. Wright was in a relationship with Roxanne Wright for many years, and they finally married in 2021.

In late 2021, the couple ended up in Tennessee where they moved around and existed off of whatever money they made from jobs they could pick up here and there. Paragraph 85 of the PSR relates that Roxanne died in November of 2021 because of a combination of a progressive Lupus and a coronavirus infection.

Mr. Wright was heartbroken as a result of this tragic and devastating loss. By picking up rides where he could find them, Mr. Wright found his way to Florence. Mr. Wright was homeless and virtually at rock-bottom. He had not been on any of his medication for some time.

Paragraph 19 of the PSR summarizes a conversation Mr. Wright had with the officer who transported him from Lumberton back to Florence. Mr. Wright told the officer that he was across the street from the Florence Baptist Temple when they had what appeared to be a full congregation leaving the church. It was cold and raining, and none of those folks asked him if he needed anything. This bothered Mr. Wright, who quite frankly, was in need of help. After a day or so

had passed, with Mr. Wright sleeping outside in the area of the Wal-Mart, he made his way over to Cherokee Road. The morning of December 21, 2021, Mr. Wright decided to go inside the Immanuel Baptist Church to ask for help. He was still angry from his recent experience at the Baptist Temple. Mr. Wright asked a church employee for some help. The church employee told him that they could not help him, and she told him that maybe another church in the area could help him.

Although this church employee meant well and was trying her best to help Mr. Wright. In Mr. Wright's current state, he did not take it that way. Mr. Wright did not perceive this response as help, and he snapped. It was at this point that Mr. Wright left the church only to quickly return and set about committing these offenses which culminated in his arrest later that day in Lumberton, North Carolina.

OTHER SENTENCING CONSIDERATIONS

Mr. Wright has thought about what he did and what he put Mr. Pittman and others through on December 21, 2021, a great deal since then. He regrets what he did, and he knows that no one should ever be the victim of such offenses. Mr. Wright knows that he will receive a substantial prison sentence as a result of his actions that day.

In addition to the foregoing, and in the event this Honorable Court does not see fit to impose a below guideline sentence, Mr. Wright would like for the court to consider a sentence of 210 months imprisonment.

Mr. Wright's current range is (210-262). Mr. Wright's range is the result of his plea to both kidnapping and carjacking. These offenses group together by units. Due to the grouping by units, Mr. Wright's offense level is two (2) levels higher than it would be had he only pleaded guilty to kidnapping. Kidnapping is the more serious of the two offenses, and the carjacking

component of the case is more incidental to the kidnapping component. Grouping by units is more appropriate when someone commits several robberies. Those offenses are all treated as separate guideline calculations and they are grouped together by units.

Mr. Wright's advisory sentencing guideline range for kidnapping only would be (168-210). The high end of the kidnapping only range is 210 months, and the low end of Mr. Wright's current range for both offenses is 210 months. It would be perfectly reasonable for Mr. Wright to receive a sentence of 210 months.

CONCLUSION

Based on the foregoing, Mr. Wright respectfully requests that this Honorable Court impose a sentence below his current advisory guideline range, and, in the alternative, for a sentence of 210 months imprisonment.

Respectfully submitted,

/s/ Michael A. Meetze

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August 9, 2022